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## Mars Khaimov Law, PLLC

# MEMO ENDORSED

February 22, 2021

BY ECF  
Honorable Valerie

Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Dilenia Paguada v. Whitmore Family Enterprises LLC; 1:20-cv-08922-VEC

To the Honorable Judge Caproni,

This office represents the Plaintiff in the above-referenced action. Respectfully, Plaintiff is submitting this letter-motion on behalf of Defendant, who is seeking an adjournment of the initial pretrial conference, currently scheduled for February 25, 2021. Plaintiff has been in communication with Defendant's counsel from the office of Casner & Edwards, LLP. However, due to the attorneys not being admitted in this District, Defendant is seeking an adjournment of the conference to hire local counsel and proceed accordingly. Additionally, the Parties are currently in ongoing negotiations in furtherance of a possible resolution of the matter, and judicial intervention is not deemed necessary at this time, respectfully.

This is the first time this relief is being sought from the Court, and both Parties consent. The Parties' proposed new date for the initial pretrial conference to take place is March 26, 2020, or any date agreeable to the Court thereafter.

Respectfully,

/s/ Mars Khaimov, Esq.

Cc: Edward V. Colbert III, Esq.  
Casner & Edwards, LLP



Application GRANTED.

The initial pretrial conference currently scheduled for February 25, 2021 is hereby adjourned to **Friday, March 26, 2021, at 9:30 A.M.** Pre-conference submissions are due no later than **Thursday, March 18, 2021**. For information about the requirements of the pre-conference submissions, the parties must consult the Notice of Initial Pretrial Conference, Dkt. 5.

All parties and any interested members of the public must attend the conference by dialing 1-888-363-4749, using the access code 3121171, and the security code 8922. All attendees are advised to mute their phones when not speaking and to self-identify each time they speak. Recording or rebroadcasting the proceeding is strictly prohibited by law.

SO ORDERED.



Date: February 23, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE